

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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*In Re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation*

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**Master File No. 1:00 – 1898  
MDL 1358 (SAS)  
M21-88**

**This Document Relates To:**

*New Jersey Department of Environmental Protection, et al. v.  
Atlantic Richfield Co., No. 1:08-CV-00312-SAS*

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**LUKOIL PAN AMERICAS, LLC's RULE 7.1 DISCLOSURE**

In accordance with Federal Rule of Civil Procedure 7.1, defendant Lukoil Pan Americas, LLC states that it is a wholly owned subsidiary of LITASCO SA in Geneva, Switzerland. LITASCO SA is an indirect wholly owned subsidiary of PJSC LUKOIL, a publicly traded Russian open joint stock company that trades on the London Stock Exchange as well as stock exchanges in Russia<sup>1</sup>. Respectfully submitted this 25th day of October, 2018.

s/ Katherine M. Katchen  
Katherine M. Katchen (*pro hac vice*)  
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America LLC, LUKOIL Pan Americas, LLC,  
and PJSC LUKOIL*

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<sup>1</sup> In July 2015, to comply with Russian legal requirements regarding corporate names, the name of OAO LUKOIL (also known as Open Joint Stock Company or OJSC LUKOIL) was changed to Public Joint Stock Company LUKOIL (PJSC LUKOIL or PAO LUKOIL).

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 25, 2018, Rule 7.1 disclosure statement of Defendant Lukoil Pan Americas, LLC, was electronically filed and served on all counsel of record via the Court's CM/ECF system.

s/ Katherine M. Katchen  
Katherine M. Katchen